

1 KAEMPFER CROWELL  
2 Robert McCoy, No. 9121  
3 Sihomara L. Graves, No. 13239  
4 1980 Festival Plaza Drive, Suite 650  
5 Las Vegas, Nevada 89135  
6 Telephone: (702) 792-7000  
7 Facsimile: (702) 796-7181  
8 Email: [rmccoy@kcnvlaw.com](mailto:rmccoy@kcnvlaw.com)  
9 Email: [sgraves@kcnvlaw.com](mailto:sgraves@kcnvlaw.com)

10 STEPTOE LLP  
11 Michael J. Allan (*pro hac vice*)  
12 1330 Connecticut Ave., NW  
13 Washington, DC 20036  
14 Telephone: (202) 429-3000  
15 Email: [mallan@steptoe.com](mailto:mallan@steptoe.com)

16 ZACHARIA LAW PLLC  
17 John H. Zacharia (*pro hac vice*)  
18 1701 Pennsylvania Ave., NW, Suite 200  
19 Washington, DC 20006  
20 Telephone: (202) 845-5091  
21 Email: [john@zacharialaw.com](mailto:john@zacharialaw.com)

22 Attorneys for Plaintiff Louis Vuitton  
23 Malletier S.A.S.

24  
15 UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA

17 LOUIS VUITTON MALLETIER S.A.S.,  
18 Plaintiff,  
19 vs.  
20 BOULEVARD VENTURES LLC; 2495  
21 RIVIERA LLC; and DENNIS TROESH,  
22 Defendants.

23 Case No. 2:24-cv-02015-RFB-BNW

24  
**STIPULATED DISCOVERY PLAN  
AND PROPOSED SCHEDULING  
ORDER**

**SPECIAL SCHEDULING REVIEW  
REQUESTED**

25 Pursuant to Fed. R. Civ. P. 26(f), LR 26-1(a), plaintiff Louis Vuitton  
26 Malletier S.A.S. (“Louis Vuitton”) and defendants Boulevard Ventures LLC, 2495

1 Riviera LLC and Dennis Troesch (together “Defendants”) (all collectively the  
2 “Parties”) submit the following Stipulated Discovery Plan and Proposed Scheduling  
3 Order:

4 **I. MEETING**

5 The Parties’ counsel met telephonically for a Fed. R. Civ. P. 26(f)  
6 conference on January 15, 2025.

7 **II. INITIAL DISCLOSURES**

8 The Parties will make Fed. R. Civ. P. 26(a)(1) initial disclosures on or  
9 before January 31, 2025.

10 **III. PROTECTIVE ORDER**

11 The Parties intend to seek a protective order under Fed. R. Civ. P 26(c)  
12 to facilitate document production and disclosure, while protecting the Parties’  
13 respective interests in their confidential information. The Parties will submit a  
14 proposed protective order in a separate filing.

15 **IV. DISCOVERY PLAN**

16 The Parties jointly propose the following discovery plan:

17 **A. Discovery Cut-Off Date.**

18 The Parties propose that the discovery period run until August 1, 2025.  
19 This exceeds the 180-day presumptive outside limit provided by LR 26-1(b)(1) for  
20 completing discovery for the reasons explained in Section V below.

21 **B. Fed. R. Civ. P. 26(a) Disclosures (Experts).**

22 The parties propose that Fed. R. Civ. P. 26(a)(2) disclosures of experts  
23 and expert reports proceed as follows:

1. All parties shall disclose initial experts and expert reports by June 2, 2025, which is 60 days before the discovery cut-off);
2. All parties shall disclose rebuttal experts and their reports by July 2, 2025, which is 30 days before the discovery cut-off;

### **C. Amending the Pleadings and Adding Parties.**

The parties shall file any motions to amend the pleadings or to add parties no later than May 1, 2025. This date is 90 days before the discovery cut-off.

## D. Dispositive Motions.

## **E. Pretrial Disclosures/Order.**

13                   The joint pretrial order shall be filed no later than October 2, 2025  
14 unless a dispositive motion is filed in which case the joint pretrial order will be  
15 suspended until 30 days after decision on the dispositive motions or further court  
16 order.

## V. JUSTIFICATION FOR LONGER DISCOVERY PERIOD

18 The parties believe the Court should permit a longer period for  
19 discovery than what is provided in LR 26-1(b)(1) for several reasons. This is a case  
20 based on claims of secondary trademark liability. The parties expect there may be  
21 discovery directed to several third parties with respect to both the underlying  
22 allegations of direct infringement, and claims and/or defenses concerning the  
23 contributory liability claims. In addition, plaintiff expects that early discovery is  
24 likely to lead to the identification of other parties that may need to be joined in the

1 case. The parties respectfully submit that the addition of roughly 90 additional days  
2 to the discovery schedule is reasonable in view of the expected fact and expert  
3 discovery in this case.

4 The parties submit that their proposed discovery plan is an efficient and  
5 realistic schedule for completing the significant amount of discovery contemplated  
6 in this case.

7 **VI. AGREEMENT FOR SERVICE OF DISCOVERY BY EMAIL**

8 The parties agree that, as permitted by Fed. R. Civ. P. 5(b)(2)(E), any  
9 party may serve discovery disclosures, requests, responses, or notices on counsel for  
10 the other parties in this case by email and that such email service will constitute  
11 complete service under Fed. R. Civ. P. 5(b) so long as it is served by email on all  
12 listed counsel of record.

13 This agreement will apply to any and all discovery made or requested  
14 under Fed. R. Civ. P. 26, 27, 30, 31, 33, 34, 35, 36, and 45.

15 **VII. OTHER ISSUES**

16 **A. Alternative Dispute Resolution.**

17 The parties have conferred about the possibility of using alternative  
18 dispute resolution processes. The parties agree this issue is best addressed after some  
19 discovery has taken place.

20 **B. Alternative Forms of Case Disposition.**

21 The parties considered trial by magistrate judge and the use of the short  
22 trial program. The parties do not consent to either at this time.

23

24

1                   **C. Electronic Evidence.**

2                   The parties have considered the possibility of presenting evidence to  
 3 the jury in electronic format. In the event that any electronic evidence is submitted  
 4 by either party, the parties understand that such evidence must be submitted in a  
 5 format that is compatible with the Court's electronic jury evidence display system.  
 6 The parties will consult the Court's website or contact the courtroom administrator  
 7 for instructions about how to prepare evidence in a format that meets these  
 8 requirements.

9                   **D. Court Conference.**

10                  The parties do not request a conference with the Court before entry of  
 11 the scheduling order.

12 KAEMPFER CROWELL

13 

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 15 Sihomara L. Graves, No. 13239  
 16 1980 Festival Plaza Drive, Suite 650  
 Las Vegas, Nevada 89135

17 STEPTOE LLP  
 18 Michael J. Allan (*pro hac vice*)  
 1330 Connecticut Ave., NW  
 Washington, DC 20036

19 ZACHARIA LAW PLLC  
 20 John H. Zacharia (*pro hac vice*)  
 1701 Pennsylvania Ave., NW, Ste. 200  
 Washington, DC 20006

21 Attorneys for Plaintiff Louis Vuitton  
 22 Malletier S.A.S.

12 GARMAN TURNER GORDON LLP

13 /s/ Steven E. Kish III

14 Erika Pike Turner, No. 6454  
 15 Steven E. Kish III, No. 15257  
 16 7251 Amigo Street, Ste. 210  
 Las Vegas, Nevada 89119

17 Attorneys for Defendants Dennis  
 18 Troesh, 2495 Riviera LLC, and  
 19 Boulevard Ventures LLC

*Louis Vuitton v. Boulevard Ventures, et al.*  
2:24-cv-02015-RFB-BNW

*Stipulated Discovery Plan and  
Proposed Scheduling Order*

## ORDER

IT IS SO ORDERED.

Ben Weller  
UNITED STATES MAGISTRATE JUDGE

DATED: 1/16/2025